



U.S. Department of Justice

*United States Attorney
District of Maryland*

Coreen Mao
Assistant United States Attorney
Coreen.Mao@usdoj.gov

Mailing Address:
6500 Cherrywood Lane, Suite 200
Greenbelt, MD 20770-1249

Office Location:
6406 Ivy Lane, 8th Floor
Greenbelt, MD 20770-1249

DIRECT: 301-344-0112
MAIN: 301-344-4433
FAX: 301-344-4516

October 7, 2022

The Honorable Catherine C. Blake
United States District Court for the District of Maryland
Garmatz Federal Courthouse
101 West Lombard Street
Baltimore, Maryland 21201

Re: *United States v. Farace et al.*,
Criminal No. CCB-21-294

Dear Judge Blake:

I write regarding the status of the above-captioned case. The two defendants in this case, Ryan Farace ("R. Farace") and Joseph Farace ("J. Farace"), were each charged in a one-count indictment with conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h). Initial appearances for J. Farace and R. Farace occurred on October 6 and 8, 2021, respectively; in addition, R. Farace had his arraignment on October 8, 2021.

On September 8, 2022, R. Farace pled guilty to Count One of the Indictment and sentencing is scheduled for November 30, 2022. With respect to J. Farace, the plea offer extended by the Government on July 26, 2022 remains under consideration, and the parties continue to be in communication regarding its status. Accordingly, the parties request that a further status update be scheduled for three weeks from today, on October 28, 2022, with the understanding that should the outstanding plea offer be accepted, the parties will promptly reach out to the Court to schedule a hearing. The parties also request a tolling of the Speedy Trial clock through October 28, 2022, for which the Government will file a separate consent motion and proposed order.

Respectfully submitted,

/s/

Coreen Mao
Assistant United States Attorney

cc: David Walsh-Little, Esq. (via ECF)
Gerry Ruter, Esq. (via ECF)